

From: [Jennifer Gaines](#)
To: Gaines.jennifer@epa.gov
Subject: Fw: Rodenticide Risk Mitigation
Date: 05/31/2012 09:21 AM

Jennifer Gaines
Wildlife Biologist
U.S. Environmental Protection Agency
Insecticide-Rodenticide Branch
Registration Division (7505P)

Tel: 703 305-5967
Fax: 703 305-6309

----- Forwarded by Jennifer Gaines/DC/USEPA/US on 05/31/2012 09:17 AM -----

From: Russell Wasem/DC/USEPA/US
To: "John Lublinkhof" <jlublinkhof@belllabs.com>
Cc: Laura Parsons/DC/USEPA/US@EPA, Jennifer Gaines/DC/USEPA/US@EPA
Date: 01/11/2010 04:17 PM
Subject: Re: Fwd: Rodenticide Risk Mitigation

John,

I apologize for the extremely tardy response to this question.

We have discussed this and feel that, dumpsters more than 50 feet away from a building whether in fenced off areas or unfenced off areas do not constitute buildings and will not be permitted application sites for non-field use products. In the case the dumpster is located in a structure but still outside (ie a roofed structure that offers the dumpster some protection from the elements, but does not have walls on all sides) best professional judgement is to be used to decide whether a structure is a building.

I will defer your question regarding the stricter label language on other 2nd generation anticoagulant products to Jen.

Regards,

Rusty_____

Rusty Wasem / Chemical Review Manager
Risk Management & Implementation Branch 1*
Pesticide Re-evaluation Division* / Office of Pesticide Programs
703 / 305 6979

▼ "John Lublinkhof" ---01/11/2010 10:31:52 AM---Rusty, I haven't heard back on the question in the following e-mail I sent Dec

From: "John Lublinkhof" <jlublinkhof@belllabs.com>

To: Russell Wasem/DC/USEPA/US@EPA
Date: 01/11/2010 10:31 AM
Subject: Fwd: Rodenticide Risk Mitigation

Rusty,

I haven't heard back on the question in the following e-mail I sent Dec 14th?

Best regards,

John Lublinkhof
Bell Laboratories, Inc.
608-241-0202 Ext. 3138

-----Original Message-----

From: "John Lublinkhof" <jlublinkhof@belllabs.com>
To: "Russell Wasem" <wasem.russell@epamail.epa.gov>
Date: Mon, 14 Dec 2009 10:37:33 -0600
Subject: Rodenticide Risk Mitigation

Dear Rusty,

I have another question regarding mitigation labeling. I know most labels will require a statement stating "Do not apply further than 50 feet from buildings." There are several establishments that have garbage dumpsters which are often located further than 50 feet from buildings. These are often fenced off areas or in many cases they are not. How are these sites to be handled?

I look forward to hearing back from you. We much appreciate you getting answers to these supplemental type questions.

Thanks,

John Lublinkhof, Ph.D.
Director of Regulatory Affairs
Bell Laboratories, Inc.
608-241-0202 Ext. 3138